

REMARKS

Claims 1, 4, 8 and 9 have been amended. Claims 2, 3, 5-7, 10, 12 and 13 are now dependent on claims that are currently amended. Claim 11 was previously cancelled. Applicant respectfully traverses the Examiner's rejections of claims 15-20. Thus, claims 1-10 and 12-20 are currently pending. Applicant has carefully reviewed the positions in the Final Office Action of June 2, 2005 and respectfully requests reconsideration of the claims in light of the amendments and the remarks presented below.

Claim Rejections Under 35 U.S.C. §102

Claims 1-6, 8-10 and 12 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,434,139 B1 to Liu. Since Liu does not teach the use of a source interface device in the manner recited by the Applicant's amended claims, Applicant requests favorable reconsideration of claims 1-6, 8-10 and 12.

The rejection of claim 1 over Liu identified the base station (32) of Liu as anticipating Applicant's source interface device. Applicant notes that in the original Office Action mailed June 18, 2004, the rejection of claim 1 identified the mobile switching center (34) of Liu as anticipating Applicant's source interface device. Claim 1 has been currently amended to clarify that the separately claimed source system includes a base station. Such a base station is identified in Applicant's Figure 3 at (120). Since amended claim 1 also requires "a source interface device adapted to receive voice data packets, of a specified format from the base station of the source system . . ." it is clear that the base station (32) of Liu cannot anticipate Applicant's source interface device. Moreover, the arguments provided in Applicant's Amendment dated December 17, 2004 at pp. 10-11 explain why the Mobile Switching Center (34) of Liu does not anticipate Applicant's source interface device.

The rejection of claim 4 over Liu relies upon the base station (32) of Liu as anticipating Applicant's source interface device and the Mobile Switching Center (34) of Liu as anticipating Applicant's mobile telephone switching office. Applicant has clarified the invention of amended claim 4 such that "the wireless source telephone is further adapted to transmit the data packets to

the base station" and that the mobile telephone switching office includes a source switching device "adapted to receive the voice data packets from the base station." Thus, the base station in Applicant's invention is part of Applicant's source system. The base station described in Liu's disclosure is similar to that described in Applicant's source system and does not anticipate Applicant's source interface device. Moreover, amended claim 4 is dependent on Amended claim 1 and should be allowed for the same reasons as Amended claim 1.

Claims 2, 3, 5 and 6 depend directly or indirectly on amended claim 1 and are therefore distinct from Liu for the same reasons as Amended claim 1. On that basis, Applicant requests the favorable reconsideration of each of claims 2, 3, 5 and 6.

Claim Rejections Under 35 U.S.C. §103

Claims 7 and 13-14 have been rejected as obvious over Liu in view of the admitted prior art. Claims 15-20 have been rejected as obvious over Liu in view of U.S. Patent No. 6,697,355 to Lim.

Each of claims 7 and 13-14 are dependent either directly or indirectly on Amended claim 1. As described above amended claim 1 is distinct from the disclosure in Liu. Moreover, none of the admitted prior art identified by the Examiner teach or suggest combining the missing elements of amended claim 1 with the teaching in Liu. Thus, claims 7 and 13-14 are allowable for the same reasons as amended claim 1. On this basis, Applicant requests favorable reconsideration of claims 7 and 13-14.

The rejection of claim 8 describes the gateway (22) of Liu as routing source data packets to a source interface, and the gateway (24) of Liu as routing the reformatted voice data packets over the IP packet switched network to a destination interface. However, the invention taught by the present application describes the gateways as having different functions. See Figure 3 at 132 and 134. To clarify this particular embodiment of Applicant's invention, Applicant has amended claim 8 to require "routing the reformatted voice data packets through a source gateway, over the IP packet-switched network, through a destination gateway to a destination interface. Thus, the gateways in Liu cannot perform either of the routing functions of amended claim 8. The system described in Liu routes the data through a gateway to the network and thus the gateways do not perform the steps of "routing source data packets to a source interface" or "routing the

reformatted voice data packets through a source gateway, over the IP packet switched network, through a destination gateway to a destination interface." That is, the gateways in Liu do not perform the routing function themselves. Lim does not teach or suggest the steps missing from Liu of routing of data to either a source or destination interface. Thus, the combination of Liu and Lim, which is not suggested or taught by either, does not render the invention claimed in amended claim 8 obvious.

The rejection of claim 9 describes the base station 32 of Liu as teaching Applicant's source interface device. However, the base station 32 of Liu does not teach or suggest the adaptation of routing the long distance calls to a source gateway. In Liu, this function is handled by the Mobile Switching Center 34. The base station in Liu merely routes the calls to the Mobile Switching Center. To clarify the way this particular embodiment of Applicant's invention operates, Applicant has recited in claim 9 that "the source system includes a mobile telephone switching office which is adapted to receive local calls and long distance calls and the long distance calls are routed to a source interface device." This particular embodiment is taught in Figure 3 of the Application. Thus, the base station (32) of Liu cannot perform the function of the source interface device of claim 9. In Liu, the base station routes the calls to the Mobile Switching Center, whereas in this particular embodiment of Applicant's invention, the source interface device receives calls from the Mobile Telephone Switching Office. Lim does not teach or suggest the missing element of Liu of a source interface device that is adapted to route long distance calls from a mobile telephone switching office to a source gateway. Thus, the combination of Liu and Lim, which is not taught or suggested by either, does not render the invention of claim 9 obvious. On this basis, Applicant requests favorable reconsideration of amended claim 9.

Claims 10 and 12 are dependent either directly or indirectly on claim 9. Thus they are distinct from any combination of Lim with Liu for the same reasons as amended claim 9. On this basis, Applicant requests favorable reconsideration of claims 10 and 12.

The rejection of claim 15 relies upon the same arguments as the anticipation rejection of claim 1, wherein the base station 32 of Liu is equated with the first interface device of Applicant's claimed invention. Applicant respectfully traverses this argument. The particular

embodiment of Applicant's invention recited in claim 15 describes the first interface devices as communicating with the first switching office on one end and communicating with the first gateway on the other end. The base station (32) of Liu cannot perform these functions as it is taught as being in communication with a mobile telephone on one end and with a mobile switching center on the other. At least in this regard, Applicant's invention is distinct from the teaching of Liu. Lim does not teach the missing elements from Liu of a first and second interface devices which transmit and receive data in the manner recited in Claim 15. Thus, the combination of Liu and Lim, which is not taught or suggested by either, does not render the invention claimed in claim 15 obvious. On this basis, Applicant requests favorable reconsideration of claim 15.

Claims 16 and 17 depend on claim 15. On the same basis as described with regard to claim 15, Applicant requests favorable reconsideration of dependent claims 16 and 17.

The rejection of claim 18 has relied upon Liu to teach the system claimed therein except for a second wireless device and a second switch office that is taught by Lim. Applicant respectfully traverses the argument that Liu anticipates the remaining elements of Applicant's claimed invention.

Claim 18 describes a system wherein both long distance and local calls are routed through first and second local offices. It is these local offices that "receive and transmit long distance voice data" from first and second gateway devices. The first and second local offices "are further configured to transmit and receive local voice data between themselves." This particular embodiment is described in Applicant's Figure 2. In Liu only the local calls are routed through a local office. Moreover, Lim does not teach or suggest the missing elements of claim 18 of routing both local and long distance calls through a local office. Thus, the combination of Liu and Lim, which is not taught or suggested by either, does not render the invention of claim 18 obvious. On this basis, Applicant requests favorable reconsideration of claim 18.

Claims 19 and 20 are dependent either directly or indirectly on claim 18. Claims 19 and 20 are distinct and non-obvious from Liu and Lim for the same reasons as claim 18. On the same basis as described with regard to claim 18, Applicant requests favorable reconsideration of claims 19 and 20.



CONCLUSION

Applicant has made an earnest and bona fide effort to clarify the issues before the Examiner and to place this case in condition for allowance. Therefore, reconsideration and allowance of Applicant's claims 1-10 and 12-20 are believed to be in order and an early Notice of Allowance to this effect is earnestly solicited.

REQUEST FOR ONE-MONTH EXTENSION OF TIME

Applicant respectfully request a one-month extension of time to respond to the Final Office Action dated June 2, 2005, in the above-identified application.

Respectfully submitted,

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By:

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